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Federal Election Commissioners Federal Election Commission 999 E Street, N.W. Washington, D. C. 20463

ATTN: Mr. Delbert K. Rigsby, Attorney

22 July 06

FEDE TION
FEICE OF GENERAL
COUNSEL

## **Dear Commissioners:**

While I understand that a 'millionaires' law exists, to avoid abuses, on the reporting of personal contributions to one's campaign, I strongly disagree on the subjective and severe fine melded out to me. I ran for the United States Senate against a 24-year incumbent with extremely high approval ratings and name recognition, Mr. Chris Dodd. In addition, Senator Dodd <u>outspent me by almost 4 to 1</u>. Finally, he won by a percentage of about 64% to 33%. One would expect that your subjective find take into account such reality.

White I accept my responsibility for my campaign, I did have an accountant, an administrator (who filed all FEC returns) and a campaign manager, all of whom, were directed to make sure that we filed all required reports. Unfortunately, the 'millionaire's form was possibly filed late in some instances (don't know for sure since the administrator who filed the returns states that she contacted the FEC in every filing to make sure that we met the requirements and was told that we did). Also, my campaign manager, states that in every instance of a contribution made by me, he did immediately and directly contact each of the opposing campaigns to alert them to these facts of my contributing. He is prepared to swear to this fact. My administrator had to be located (took months) and she has been hard pressed to take the time to review all of the documents, which only she clearly understands (thus, the main reason for the delay in responding to you).

With Respect,

Jack C. Orchulli

Darien, Ct. 06820